

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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| In re TRUECAR, INC. SHAREHOLDER<br>DERIVATIVE LITIGATION | ) | Lead Case No. 1:19-cv-00617                |
|  | ) |  |
|  | ) | (Consolidated with Case No. 1:19-cv-00625) |
|  | ) |  |
| This Document Relates To:                                | ) |  |
|  | ) |  |
| ALL ACTIONS  | ) |  |
|  | ) |  |
|  | ) |  |

**PLAINTIFF'S UNOPPOSED MOTION FOR VOLUNTARY DISMISSAL WITHOUT  
PREJUDICE PURSUANT TO FED. R. CIV. P. 23.1(c) and 41(a)**

Pursuant to Federal Rules of Civil Procedure 23.1(c) and 41(a), Plaintiff Ara Afarian (“Plaintiff”), by his undersigned counsel, hereby moves this Court for an Order voluntarily dismissing this Action brought on behalf of Nominal Defendant TrueCar, Inc. (“TrueCar”), against defendants Victor Perry, Michael Guthrie, John Pierantoni, Abhishek Agrawal, Robert Buce, Christopher Claus, Steven Dietz, John Krafcik, Erin Lantz, John Mendel, Wesley Nichols, Ion Yadigaroglu, and the United States Automobile Association (together with TrueCar, the “Defendants”), without prejudice and with all parties to bear their own costs and fees. Counsel for the parties have met and conferred regarding the issues raised in this Motion, and Defendants do not oppose this Motion.

DATED: August 29, 2019

/s/ *Blake A. Bennett*

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